

THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

CAPITAL PRIDE ALLIANCE, INC.,

Plaintiff,

v.

DARREN DOLSHAD PASHA,

Defendant.

Case No. 2025-CAB-007162

PLAINTIFF'S PRAECIPE PROVIDING ADDITIONAL CONTEXT REGARDING
POST-HEARING ESCALATION AND COMMUNITY SAFETY CONCERNS

COMES NOW, Plaintiff Capital Pride Alliance, Inc., by and through undersigned counsel, to respectfully submit this praecipe to provide additional context that may assist the Court in understanding the broader pattern of conduct surrounding recent filings, hearings, and community safety concerns.

Plaintiff does not submit this praecipe to seek immediate additional relief, to expand the existing anti-stalking order through this filing, or to ask the Court to adjudicate any new allegations without the ordinary process required by law. Rather, Plaintiff submits this praecipe because recent events appear consistent with a pattern Plaintiff observed for more than a year before this action was filed: After Defendant experiences a perceived setback, adverse ruling, denial of access to an event, unfavorable public response, or failure to secure the narrative he seeks, members of the

Capital Pride community often begin receiving sudden barrages of angry, accusatory, insulting, threatening, or otherwise harassing messages.

That pattern is part of the reason Plaintiff ultimately sought court protection. For more than a year, Capital Pride board members, staff, volunteers, and community leaders would periodically receive waves of hostile communications from Defendant. When those episodes occurred, Plaintiff would often attempt to determine what had “set him off” and whether the organization could avoid further harassment simply by disengaging. Over time, it became clear that non-engagement did not resolve the problem. Instead, the conflict continued to recur and escalate, eventually requiring Plaintiff to seek protection from this Court.

Plaintiff raises this issue now because, shortly after the setbacks and developments that occurred on Friday, undersigned counsel began receiving reports from individuals connected to this matter that they had again begun receiving harassing or threatening messages, including from accounts they believed to be false, anonymous, or newly created. Several of the individuals who contacted undersigned counsel had previously participated in Capital Pride’s internal investigation, testified or provided information adverse to Defendant, or otherwise had some connection to the events underlying this case. Several reported that the new messages were similar in tone, timing, and pattern to prior barrages they associated with Defendant.

Some of those individuals asked whether they were covered by the existing anti-stalking order. In several instances, the answer was no. Plaintiff’s existing organizational order includes numerous protected persons, but Plaintiff did not include every former board member, former staff member, former volunteer, witness, community leader, or affected individual who might have reason to fear further harassment. Plaintiff made that decision in good faith because the proposed protected-person

list was already lengthy, and Plaintiff was concerned that asking the Court to include every potentially affected person could appear excessive or overbroad. Plaintiff therefore limited the list to current board members, current staff, and key volunteer leaders most directly connected to Capital Pride's ongoing operations.

As a result, when individuals not covered by Plaintiff's organizational order have contacted undersigned counsel, undersigned counsel has explained that they may need to seek individual protection if they believe they are being stalked or threatened. Undersigned counsel has provided general guidance on a pro bono basis regarding the anti-stalking order process, including that the Domestic Violence Division provides an accessible self-help mechanism, that applications may be submitted without counsel, that applicants generally must identify at least two qualifying incidents including one within the past ninety days, and that service of any temporary order remains a practical issue that must be addressed through proper channels.

Service has been a particular concern. In Plaintiff's own experience, Defendant avoided ordinary service attempts at his residence. The process server reported that Defendant denied being the person sought, claimed the person had moved out, refused to accept service, and then opened the door only after the process server moved away in order to photograph the process server before closing the door again. Defendant also did not accept service when police were called to assist. Ultimately, Plaintiff was required to coordinate service at a public event that Defendant was known to be attending. That practical history is relevant because several individuals who have considered seeking individual anti-stalking orders have expressed concern not only about whether they could obtain protection, but whether they could safely and effectively serve Defendant.

Undersigned counsel has also been contacted by individuals who already have anti-stalking orders or who intend to pursue criminal contempt complaints based on conduct they believe violated existing orders. Some reported receiving threatening or harassing messages after recent proceedings. Others reported that Defendant appeared at public community events where protected or affected individuals were expected to be present. Several individuals also expressed concern that Defendant appears to use cross-filings, competing anti-stalking order applications, or public appearances as a means of placing the burden on others to leave community spaces rather than complying with the protective purpose of existing orders.

Plaintiff has also received reports that individuals outside Capital Pride, including leaders associated with Black Pride and Trans Pride, have raised similar safety concerns with government and community stakeholders, including concerns that Defendant presents a community safety risk and that certain events may need to deny him entry to protect attendees. Plaintiff does not ask the Court to adjudicate those reports in this praecipe. Plaintiff provides this information only to explain that the present dispute is not limited to isolated filings or isolated interpersonal disagreements, but exists within a broader pattern of community concern that tends to intensify around hearings, adverse rulings, and public events.

Undersigned counsel has also assisted one servicemember who previously testified or provided information adverse to Defendant and who reported receiving anonymous threats that his military chain of command would be contacted. In response, undersigned counsel prepared a security-related memorandum so that the servicemember's chain of command would understand the nature of the dispute, the identity of the individual involved, and the potential for disruptive or retaliatory contact. That issue is similar in kind to the allegations Defendant raised at the conclusion

of the last hearing, when he characterized undersigned counsel's security-related reporting as racially motivated. Plaintiff respectfully submits that those characterizations omit the context in which such reporting occurs: Individuals are seeking practical protection because they believe harassment and retaliation may escalate after adverse developments in this case.

Plaintiff recognizes that Defendant may appear calm, reasonable, or procedural in communications with Chambers or in certain filings. Plaintiff also recognizes that the Court may see bursts of filings and wonder why Plaintiff's tone remains guarded or adversarial after Plaintiff has prevailed on certain issues. The purpose of this praecipe is to explain that, from Plaintiff's perspective and from the reports received by undersigned counsel, the conflict has not abated simply because a hearing has concluded or a ruling has issued. To the contrary, adverse developments often appear to be followed by renewed pressure on witnesses, community members, protected persons, and others who are not always visible to the Court.

Plaintiff therefore respectfully submits this praecipe so the Court has additional context when evaluating the parties' filings, the practical effect of existing protective relief, and the broader safety concerns arising around public events and community members connected to this matter. Plaintiff is not asking the Court to rely on this praecipe as proof of any new violation. Any person seeking individual relief, criminal contempt enforcement, or additional protection will proceed through the appropriate process. Plaintiff simply wishes to ensure that the Court understands why Plaintiff and others continue to treat this matter as an active and serious safety concern notwithstanding Defendant's more measured presentation in certain court communications.

RESPECTFULLY SUBMITTED BY:

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